

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL STATES, SOUTHEAST AND)	
SOUTHWEST AREAS PENSION FUND,)	
and HOWARD McDOUGALL, Trustee,)	
)	
Plaintiffs,)	Case No. 11 CV 92
)	
v.)	Judge Ronald A. Guzman
)	
ANDERSON BROS. STORAGE AND)	Magistrate Judge Morton Denlow
MOVING CO., an Illinois corporation,)	
)	
Defendant.)	

JOINT INITIAL STATUS REPORT

NOW COME Plaintiffs and Defendants, by and through their attorneys, and hereby submit the parties' Joint Initial Status Report.

1. Attorneys: Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure ("FRCP"), Cathy L. Rath for Plaintiffs and Todd A. Miller for Defendant, Anderson Bros. Storage and Moving Co., conferred on February 8, 2011, to prepare this Joint Initial Status Report.

2. Pre-discovery Disclosures: The parties will exchange the information required by Rule 26(a)(1) of the FRCP by February 25, 2011.

3. Discovery Plan: The parties jointly propose to the Court the following discovery plan:

(a) Discovery Subjects:

(1) Plaintiffs' position: Based on conversations with Defendant's counsel regarding potential defenses, Plaintiffs believe they will

need discovery regarding Defendant's employees covered by the Pension Fund at any time during the period January 2005 through November 2010.

- (2) Defendants' position: Defendants believe that they will need discovery on the amounts owed to Plaintiffs.
 - (b) Discovery cutoff: all discovery commenced in time so that discovery will be completed by June 30, 2011.
 - (c) Maximum of 25 interrogatories for Plaintiffs and 25 for Defendant.
 - (d) The parties propose that there should be no limit on the number of requests for admission.
 - (e) Maximum of 10 depositions by Plaintiffs and 10 by Defendants. Each deposition limited to a maximum of 7 hours unless extended by agreement of the parties or court order.
 - (f) No experts will be retained and no expert reports prepared under Rule 26(a)(2) of the FRCP.
 - (g) Supplementations under Rule 26(e) of the FRCP due within fourteen (14) days after being obtained or after learning that prior disclosures were incomplete and/or incorrect.
4. Other Items:
- (a) The parties do not request a conference with the court before entry of the scheduling order.
 - (b) The parties request a pretrial conference in May 2011.

- (c) The parties should be allowed until April 6, 2011, to join additional parties and to amend the pleadings.
- (d) All potentially dispositive motions should be filed by July 29, 2011.
- (e) The parties have initiated settlement discussions.
- (f) Final lists of witnesses and exhibits under Rule 26(a)(3) of the FRCP should be due from Plaintiffs and Defendants by May 31, 2011.
- (g) Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3) of the FRCP.
- (h) The case should be ready for trial by August 2011, and at this time is expected to take approximately 1 day.

Respectfully submitted,

/s/Cathy L. Rath
Cathy L. Rath (ARDC No. 6275744)

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/s/Todd A. Miller
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CERTIFICATE OF SERVICE

I, Cathy L. Rath, one of the attorneys for the Central States, Southeast and Southwest Areas Pension Fund, certify that on February 14, 2011, I caused the foregoing Joint Initial Status Report to be filed electronically. This filing was served on all parties indicated on the electronic filing receipt via the Court's electronic filing system.

/s/ Cathy L. Rath

Cathy L. Rath

One of Central States' Attorneys